

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2018-318-E

In the Matter of:

Application of Duke Energy
Progress, LLC, for Adjustments in
Electric Rate Schedules and Tariffs
and Request for an Accounting Order

**MOTION FOR ADMISSION
*PRO HAC VICE***

Intervenors South Carolina State Conference of the National Association for the Advancement of Colored People (“South Carolina NAACP”), the South Carolina Coastal Conservation League (“CCL”) and Upstate Forever (collectively, “Petitioners”) hereby move the Public Service Commission of South Carolina (“Commission”) to permit Gudrun Elise Thompson to practice *pro hac vice* before the Commission in the above-captioned proceeding.

Pursuant to Rule 404, SCACR, Ms. Thompson, with the consent of counsel of record, has submitted to the South Carolina Supreme Court a Verified Application for Admission *Pro Hac Vice* in the State of South Carolina.

WHEREFORE, in accordance with the provisions set forth in Rule 404, SCACR, Petitioners respectfully requests that this motion be granted.

This 1st day of March, 2019.

s/ Stinson Ferguson
SC Bar No. 79871
Southern Environmental Law Center
463 King Street, Suite B
Charleston, SC 29403
Telephone: (843) 720-5270
Fax: (843) 414-7039
Attorney for Petitioners

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2018-318-E

In the Matter of:

Application of Duke Energy
Progress, LLC, for Adjustments in
Electric Rate Schedules and Tariffs
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CERTIFICATE OF SERVICE

I certify that the following persons have been served with one (1) copy of Motion for Admission *Pro Hac Vice* and Verified Application by electronic mail and/or U.S. First Class Mail at the addresses set forth below:

Heather Shirley Smith
Duke Energy Progress, LLC
40 W. Broad Street, Suite 690
Greenville, SC 29601
Heather.smith@duke-energy.com

Becky Dover
Carri Grube-Lybarker
SC Department of Consumer Affairs
bdoover@scconsumer.gov
clybarker@scconsumer.gov

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550 South Tryon Street
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 1508 Lady Street
 Columbia, SC 29201
selliott@elliottlaw.us

This 1st day of March, 2019.

s/ Stinson Ferguson

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 812 Schloss Street
 Wrightsville Beach, NC 28480
len.anthony1@gmail.com

VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE* IN THE STATE OF SOUTH CAROLINA

In the Matter of:

Docket No. 2018-318-E

Public Service Commission of
South Carolina

Application of Duke Energy
Progress, LLC for Adjustments in
Electric Rate Schedules and Tariffs
and Request for an Accounting
Order

Plaintiff	Case No.	Tribunal
vs.		
	Mailing Address of Tribunal:	101 Executive Center Drive, Suite 100 Columbia, SC 29210
Defendant		

Comes now Gudrun Elise Thompson, applicant herein, and respectfully represents the following:

1. Applicant resides at:

Street Address	City	County	State	Zip Code
<u>Chapel Hill</u>	<u>Chapel Hill</u>	<u>Orange</u>	<u>NC</u>	<u>27516</u>
<u>919-967-1450</u>				
Telephone				

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Southern Environmental Law Center, with offices at

601 W. Rosemary Street, Suite 220

Street Address	City	County	State	Zip Code
<u>Chapel Hill</u>	<u>Chapel Hill</u>	<u>Orange</u>	<u>NC</u>	<u>27516</u>
<u>919-967-1450</u>				
Primary Telephone	<u>919-929-4921</u>			
	Cell Phone	<u>919-929-4921</u>		
		Fax Number	<u>gthompson@selcnc.org</u>	Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by The South Carolina State Conference of the NAACP, the South Carolina Coastal Conservation League and Upstate Forever to provide legal representation in connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since August of 2002, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of North Carolina where applicant regularly practices law. Attached is a certificate of good

standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State where applicant regularly practices law.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
North Carolina state courts	August 27, 2002
US District Court for the Eastern District of North Carolina	September 5, 2002
4 th Circuit Court of Appeals	March 2, 2018

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

N/A

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court date):

N/A

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/A

8. Applicant never has had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is Stinson W. Ferguson
of the Southern Environmental Law Center law firm, which has offices at:

463 King Street, Suite B

Street Address

Charleston

Charleston

South Carolina

29403

City

County

State

Zip Code

843-720-5270

843-414-7039

sferguson@selcsc.org

Primary Telephone

Cell Phone

Fax Number

Email Address

79871

South Carolina Bar Number

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

Case Name: In the Matter of: Application of Duke Energy Carolinas, LLC for Approval of Energy Efficiency Plan Including an Energy Efficiency Rider and Portfolio of Energy Efficiency Programs (S.C. Public Service Commission)

Docket No. 2007-358-E

Status: Docket closed

Date of Application: January 25, 2008

Application Granted

Local Counsel of Record: J. Blanding Holman IV

Case Name: In the Matter of Environmental Defense Fund, et al. v. S.C. Department of Health and Environmental Control (South Carolina Administrative Law Court)

No. 09-ALJ-07-0166-CC

Status: Case dismissed with prejudice pursuant to consent order

Date of Application: May 4, 2009

Application Granted

Local Counsel of record: J. Blanding Holman IV

Case Name: In the Matter of: Application of Duke Energy Carolinas LLC for Authority to Adjust and Increase Its Electric Rates and Charges (S.C. Public Service Commission)

Docket No. 2009-226-E

Status: Docket open

Date of Application: November 6, 2009

Application Granted

Local Counsel of record: J. Blanding Holman IV

Case Name: SCE&G Company's Request for Approval of Demand Side Management Plan Including a Demand Side Management Rate Rider and Portfolio of Energy Efficiency Programs, (S.C. Public Service Commission)

Docket No. 2009-261-E

Status: Docket open

Date of Application: January 12, 2010

Application Granted

Local Counsel of record: J. Blanding Holman IV

Case Name: Application Regarding the Acquisition of Progress Energy, Inc. by Duke Energy Corporation and Merger of Progress Energy Carolinas, Inc. and Duke Energy Carolinas, LLC (S.C. Public Service Commission)

Docket No. 2011-158-E

Status: Docket open

Date of Application: October 4, 2011

Application Granted

Local Counsel of record: J. Blanding Holman IV

Case Name: Joint Application of Duke Energy Carolinas, LLC and North Carolina Electric Membership Corporation for a Certificate of Environmental Compatibility and Public Convenience and Necessity for the Construction and Operation of a 750MW Combined Generating Plant Near Anderson, SC

Docket No. 2018-392-E

Status: Docket open
 Date of Application: December 20, 2013
 Application Granted
 Local counsel of record: J. Blanding Holman IV

Case Name: Duke Energy Carolinas, LLC Annual Review of Base Rates for Fuel Costs
 Status: Docket closed
 Date of Application: August 19, 2014
 Application Granted
 Local counsel of record: J. Blanding Holman IV

Case Name: Petition of SCE&G for Updates and Revisions to Schedules Related to the Construction of a Nuclear Base Load Generation facility at Jenkinsville, South Carolina (S.C. Public Service Commission Docket No. 2016-223-E)
 Status: Docket open
 Date of Application: September 27, 2016
 Application Granted
 Local counsel of record: J. Blanding Holman IV

Case Name: Joint Application & Petition of SCE&G and Dominion Energy, Inc. for Review and Approval of a Proposed Business Combination between SCANA Corp. and Dominion Energy, Inc. as May Be Required, and for a Prudence Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost Recovery Plans (Consolidated Docket Nos. 2017-370-E; 2017-207-E; 2017-305-E)
 Status: Docket open
 Date of Application: October 5, 2018
 Application Granted
 Local counsel of record: J. Blanding Holman IV

Case Name: Annual Review of Base Rates for Fuel Costs for SCE&G (SC Public Service Commission Docket No. 2019-2-E)
 Status: Docket open
 Date of Application: February 8, 2019
 Application Granted
 Local counsel of record: J. Blanding Holman IV

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 15th day of March, 20 19



APPLICANT

VERIFICATIONSTATE OF North Carolina)COUNTY OF Orange)

I, Gudrun E. Thompson, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission pro hac vice. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear pro hac vice in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.

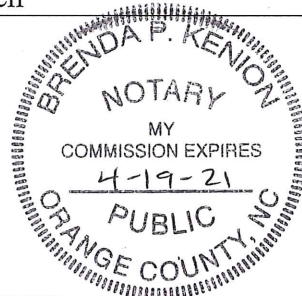
Gudrun E. Thompson
APPLICANT/AFFIANT

Subscribed and sworn to before me this 1st day of March, 20 19

Brenda P. Kenion
Brenda P. Kenion

Notary Public for the State of NC

My Commission Expires: 4-19-21

**LOCAL COUNSEL CONSENT**

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 1st day of March, 20 19

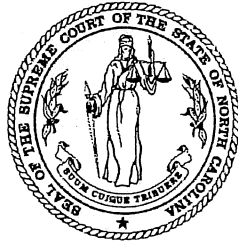
Stinson Ferguson with express permission by Robin Dunn
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 1st day of March, 20 19

Gudrun E. Thompson
APPLICANT/AFFIANT

Supreme Court OF THE STATE OF NORTH CAROLINA



I, Amy L. Funderburk, Clerk of the Supreme Court of North Carolina, do hereby certify that on August 27, 2002, license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

GUDRUN ELISE THOMPSON

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

WITNESS my hand and the Seal of the Supreme Court of North Carolina at office in Raleigh, this January 29, 2019.

A handwritten signature in cursive script, reading "Amy L. Funderburk".

Amy L. Funderburk
Clerk of the Supreme Court
of the State of North Carolina